

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

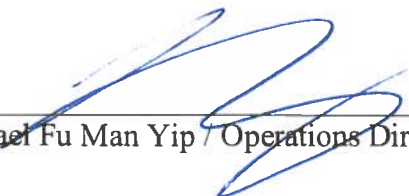
COMMISSIONERS OF PUBLIC WORKS OF )	Civil Action No. 2:21-cv-00042-RMG
THE CITY OF CHARLESTON (d.b.a. )	
Charleston Water System), Individually and on )	<u>CLASS ACTION</u>
Behalf of All Others Similarly Situated, )	
Plaintiff, )	AFFIDAVIT OF MICHAEL FU MAN YIP IN
vs. )	SUPPORT OF PLAINTIFF'S OPPOSITION
)	TO DEFENDANTS' JOINT MOTION TO
)	DISMISS
COSTCO WHOLESALE CORPORATION, )	
CVS HEALTH CORPORATION, )	
KIMBERLY-CLARK CORPORATION, THE )	
PROCTER & GAMBLE COMPANY, )	
TARGET CORPORATION, WALGREENS )	
BOOTS ALLIANCE, INC. and WAL-MART, )	
INC., )	
Defendants. )	
_____ )	

I, Michael Fu Man Yip being duly sworn, states the following:

1. I submit this affidavit in support of Plaintiff's Opposition to Defendants' Joint Motion to Dismiss.
2. I am the Operations Director for Georgetown County Water and Sewer District.
3. In my role with Georgetown County Water and Sewer District I oversee the daily operation and maintenance of the wastewater collection system.

4. I have over fifteen (15) years of experience in the Water and Sewer industry with a Master of Science in Environmental Management and Bachelor of Science in Mathematics, Chemistry, and Physics.
5. My responsibilities include implementing proactive and responsive steps toward minimizing and responding to wastewater collection blockages and overflows.
6. I oversee sixteen (16) environmental professionals who work daily to maintain and operate the District wastewater collection system.
7. Through our normal maintenance program we routinely clean our wastewater collection system and remove large quantities of wipes (also known in the wastewater industry as “rags”) from our sewers, pump stations, and other assets.
8. Based upon years of experience dealing with wipes in our wastewater collection system, I believe that the wipes we remove from our system are a combination of both flushable and non-flushable wipes.
9. We have had issues in general with wipes-related blockages and interference with our wastewater system operations.
10. We are continually concerned about wipes-related blockages in our sewer lines, pump stations, treatment plant and other facilities because wipes-related blockages are an ongoing problem, can occur at any time, and may lead to system reliability failures and sewer overflows to public and private property as well as area waterways.
11. We are so concerned about wipes-related blockages that the District has put SCADA at all critical pump stations.
12. We also use community outreach by providing a 30-second PSA to encourage our customers NOT to flush “any” wipes into our sewer system.

13. Increased cleaning schedules within the collection system have been required where the wipes collect, including pump station wet wells, mainlines, and tunnel system approach channels, vortexes, and shafts.
14. Wipes-related blockages can occur at any time and must often be managed on an emergency basis to prevent Sanitary Sewer Overflows. Notification of blockages can occur at any time through our SCADA system, normal preventive checks, and customer calls to our emergency 24-hour dispatch.
15. Wipes – both flushable and non-flushable – pose one of the most significant operational risks within our collection system and have required our expenditure of significant manpower and financial resources. We have attached photos of blockages that were caused by wipes over the past 12 months.
16. Georgetown County Water and Sewer District has increased its collection system inspection and maintenance to reduce operational risks associated with both flushable and non-flushable wipes.
17. Despite all of our targeted wipes-related mitigation measures, we can have wipes-related blockages at any time. It is a constant worry of mine and our team that I lead. These concerns have been exacerbated during the ongoing pandemic.



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Michael Fu Man Yip / Operations Director

State of South Carolina  
Georgetown County

The forgoing instrument was acknowledged before me this 13<sup>th</sup> day of May,

2021 by Michael Fu Han Yip.

Name: Seaxene M Kelly

Notary Public for South Carolina

My Commission Expires 3/8/2027





















